

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2327**

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THIS DOCUMENT RELATES TO THE CASE(S)  
LISTED ON THE EXHIBIT ATTACHED HERETO:

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**JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C. R. Bard, Inc. advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a Defendant in these actions with prejudice, each party to bear its own costs.

The settlement in the cases listed on Exhibit A relates only to Bard. Because other Defendant(s) remain in the cases listed on Exhibit A, the case(s) should remain open and Plaintiffs will continue to prosecute their claims against any remaining defendants.

Respectfully submitted February 25, 2019.

/s/ Sejal K. Brahmbhatt

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**EXHIBIT A – WILLIAMS KHERKHER HART BOUNDAS**

| <b>CIVIL ACTION NUMBER</b><br>(listed numerically in<br>ascending order) | <b>CASE NAME</b>         |
|--|--------------------------|
| 2:13-cv-13732  | Turpin, Priscilla        |
| 2:13-cv-20718  | Turner, Sondra and James |

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Richard B. North, Jr.  
Richard B. North, Jr.  
Attorney for C.R. Bard, Inc.